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12 Attorneys for Defendants

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION
17

18 RYAN ROMAIN, JUAN A. GARCIA,
19 individually, on behalf of themselves and others
similarly situated,

20 Plaintiffs,

21 v.

22 SONY COMPUTER ENTERTAINMENT
23 AMERICA LLC, and SONY NETWORK
ENTERTAINMENT INTERNATIONAL LLC,

24 Defendants.
25
26
27
28

Case No. 3:11-cv-02180-EMC

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT**

Judge: ~~Magistrate Judge Edward M. Chen~~

1 WHEREAS, defendants Sony Computer Entertainment America LLC (“SCEA”) and
2 Sony Network Entertainment International LLC (“SNEI”) have been named as defendants in at
3 least twenty-one (22) putative class action lawsuits within this District, to date;

4 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
5 least eighteen (18) putative class action lawsuits pending outside this District, to date;

6 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
7 Litigation (the “JPML”) to centralize this and other matters, to which one response has been filed
8 to date, and as to which other responses, including Sony Defendants’ response, are due by June 2,
9 2011.

10 WHEREAS, the current deadline for SCEA and SNEI to respond to the Complaint is July
11 18, 2011;

12 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
13 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
14 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
15 JPML;

16 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
17 by and through their respective counsel, hereby stipulate as follows:

18 The deadline for the defendants to respond to the Complaint in the above-captioned action
19 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
20 litigation centralizing the above-captioned action with other matters, or if centralization is denied
21 by the JPML, then 30 days from the date of such order denying centralization.

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1 Either party may seek ex parte relief from this stipulated Order for good cause shown,
2 including, but not limited to, Defendants' filing of a responsive pleading in a related case.

3
4 Dated: May 20, 2011

5 By: /s/ Michael Francis Ram /s/ [as authorized]
6 Michael Francis Ram
7 RAM, OLSON, CEREGHINO &
8 KOPCZYNSKI LLP

9 Attorneys for Plaintiffs
10 RYAN ROMAINÉ
11 JUAN A GARCIA

12 Dated: May 20, 2011

13 HARVEY WOLKOFF
14 THAD A. DAVIS
15 ROCKY C. TSAI
16 ROPES & GRAY LLP

17 By: /s/ Rocky C. Tsai /s/
18 Rocky C. Tsai

19 Attorneys for Defendants
20 SONY COMPUTER ENTERTAINMENT
21 AMERICA LLC, and SONY NETWORK
22 ENTERTAINMENT INTERNATIONAL
23 LLC

24 **[PROPOSED] ORDER**

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26 Dated: 7/12/11

27 By: 
28 U. S. District Court Magistrate Judge